

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MICHAEL FISHER, on behalf of himself and
others similarly situated,

Plaintiff,

v.

SD PROTECTION INC. d/b/a SD PROTECTION
and SANDRA DOMINGUEZ MERCADO,

Defendants.

Case No.: CV-17-2229

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law in Support of Plaintiff's Motion to Enforce the Settlement, and the accompanying Declaration of Anne Seelig, Plaintiff Michael Fisher will move this Court for an order (1) entering judgment against Defendants in the amount of \$21,000 due to Defendants' failure to comply with the Court-approved settlement; and (2) awarding Plaintiff's counsel additional attorneys' fees in the amount of \$1,650 for the time Plaintiff's counsel has spent in connection with the enforcement of the Agreement.

A proposed order is attached hereto as Exhibit A. A proposed Judgment is attached hereto as Exhibit B.

Dated: May 23, 2019

Respectfully submitted,

LEE LITIGATION GROUP, PLLC

By: /s/ Anne Seelig

Anne Seelig (AS 3976)

30 East 39th Street, Second Floor

New York, NY 10016

Tel.: 212-661-1008

Fax: 212-465-1181

Attorneys for Plaintiff